

South Carolina Department of Health and Environmental Control
Compliance Agreement
AREA 4: IFSP AND SERVICES COMPLIANCE WORK PLAN

AREA OF NON-COMPLIANCE: DHEC does not ensure that IFSPs are developed with the following required content- present levels of development and a statement of early intervention services needed. Further, DHEC is unable to ensure the provision of needed IFSP services for all eligible infants and toddlers and their families, as required by Part C regulations.

BASELINE DATA:

1. CIMP Self-Assessment Report – December 2000:

- a. Not all eligible infants and toddlers with disabilities were receiving all the services written in the IFSP as evidenced by waiting lists for services, particularly speech and occupational therapy services; and
- b. IFSP services are not consistently provided especially in rural areas, due to a lack of available providers.

2. OSEP Monitoring Report – Onsite Visit February 2002:

- a. Present levels of functioning were written on the IFSP in some developmental areas, but were frequently omitted for the physical and communication developmental areas;
- b. All needed services, including family support services, were not listed on the IFSP;
- c. Providers reported that it was difficult to obtain counseling services and parenting classes;
- d. EI services were delayed;
- e. For some infants and toddlers with disabilities and families, EI services were not provided; and
- f. Waiting lists existed for both evaluations and services.

OUTCOME: DHEC will ensure the development of complete IFSPs for all eligible infants and toddlers with disabilities and their families and ensure that all infants and toddlers with disabilities and their families are provided early intervention services in a timely manner.

Goal 1: All IFSPs will contain the required components in accordance with Part C.

Goal 2: All infants and toddlers with disabilities and their families will receive all services identified on their IFSP in a timely manner and waiting lists for all early intervention services will be eliminated.

With prior written approval from OSEP, adjustments to the Activities to Reach Results column listed in this table may be made when necessary to support achievement of compliance outcomes within the required timelines. The Activities to Reach Results will be evaluated every six months to determine their effectiveness and any need for change. Any requests for changes or amendments will be submitted to OSEP in writing.

Objectives/Activities to Reach Results	Documentation of Activities	Target Completion Date	Date Completed
Objective SP-1: Develop and implement a coordinated statewide set of strategies to ensure IFSPs are completed in accordance with Part C regulations and early intervention services are delivered in a timely manner, through analysis of root causes of problems as identified through the monthly self-report data from BabyNet Service Coordinators.			
<p>SP-1A. Compile and analyze 3 months of self-reported data through October 2003 to determine extent and root causes of difficulties in this area. Data to include:</p> <ul style="list-style-type: none"> (1) the number of infants and toddlers with disabilities with IFSPs that do not list the present levels of functioning in each of the five developmental areas; (2) the number of infants and toddlers with disabilities with IFSPs that do not provide a statement of early intervention services needed on the IFSP; (3) the number of infants and toddlers with disabilities for whom the initial IFSP was not completed within 45 days from the date of referral and the number of additional infants and toddlers with disabilities added to the list during that reporting period; (4) the number of infants and toddlers with disabilities and their families who are not receiving all the Part C services listed on the infant or toddler's IFSP; (5) the type(s) of early intervention service(s) (including services to families as well as to infants and toddlers with disabilities) that have waiting lists and for each early intervention service, the number of infants and toddlers with disabilities on the waiting list for that particular intervention service and the number of additional infants and toddlers 	<p>State report on extent and root causes of compliance problem with (1) IFSP content requirements being met, (2) completion in 45-day timeline for initial IFSP and (3) timely provision of early intervention services process will be submitted to OSEP.</p>	<p>November 30, 2003</p>	

Objectives/Activities to Reach Results	Documentation of Activities	Target Completion Date	Date Completed
with disabilities added to the waiting list for that service during the reporting period; (6) For each early intervention service for which there is a waiting list, the minimum and maximum waiting days that each eligible infant or toddler or the family is on the waiting list. (Findings: 2a, 2b, 2c, 2d, 2e, 2f)			
SP-1B. Based on the analysis of the extent and root causes, identify systemic statewide strategies (such as single provider contracts for specific areas, reimbursement strategies, etc.) to resolve compliance problems in this area related to unavailability of EI services, waiting lists, non compliant providers, etc. (Findings: 2a, 2b, 2c, 2d, 2e, 2f)	State strategies and plan for their implementation are submitted to OSEP.	January 31, 2004	
SP-1C. Implement systemic statewide strategies as determined by the plan. (Findings: 2a, 2b, 2c, 2d, 2e, 2f)	Documentation of implementation of strategies is submitted to OSEP.	April 30, 2004	
SP-1D. Continue to evaluate progress in this area through BabyTrac-II reports and data collected through SP-1A and make adjustments as necessary until desired result is reached. (Findings: 2a, 2b, 2c, 2d, 2e, 2f)	Monthly reports from BabyTrac-II available for review to track compliance.	First report available by February 29, 2004 and monthly thereafter.	
Objective SP-2: Ensure the development and implementation of IFSP completion and timely early intervention services Compliance Plans as part of the overall BN Coordination Team Compliance Plan process.			
SP-2A. Incorporate local IFSP completion and timely services improvement planning into overall BabyNet Coordination Team Compliance Plan Process under General Supervision Objectives GS-5. Each BNCT will address local issues specific to the current delivery of IFSP services in a timely manner to include resource and personnel issues. Each BN Coordination Team	Compliance Plans submitted in accordance with GS-5 will include improvement strategies to address discrepancies in data in SP-1A. Benchmarks for the Target Group 1 (6 BNCTs) will be submitted to OSEP.	Timelines as indicated in GS-5 target dates of completion. January 31, 2004	

Objectives/Activities to Reach Results	Documentation of Activities	Target Completion Date	Date Completed
<p>will demonstrate completing IFSPs, continuous improvement in eliminating waiting lists for each quarter for timely convening of initial IFSP meeting within 45 days, and timely provision of early intervention services. Quarterly benchmarks (which shall be either a percentage or a numerical decrease from the prior reporting period will be established for each BN Coordination Team and approved by OSEP). Data on each BNC team's progress in meeting the benchmarks shall be submitted to OSEP and incorporated into each respective BNCT Compliance Plan. DHEC will monitor each BNCT to ensure that benchmarks are met and will intervene directly (including using appropriate sanctions) with individual BNCTs, as necessary. (Findings: 2a, 2b, 2c, 2d, 2e, 2f)</p>	<p>Benchmarks for the Target Group 2 (6 BNCTs) will be submitted to OSEP.</p> <p>In its quarterly report to OSEP, DHEC shall provide monthly summaries for each BNCT with a completed Compliance Plan that detail progress in meeting benchmarks. A narrative shall be included that details how DHEC has analyzed and responded to the data provided by each BNCT.</p>	<p>June 30, 2004</p> <p>January 31, 2004 and quarterly progress reports thereafter.</p>	